ENFORCEMENT CONFIDENTIAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Facility Inspection Program 701 Mapes Road Fort Meade, Maryland 20755-5350 (410)-305-3029

Date:

April 26, 2011

From:

Justin Young

Inspector

CONFIDENTIAL

To:

Samantha Beers

Director, OECEJ

Re:

U.S. Coast Guard 2401 Hawkins Point Road

Baltimore, MD 21226

Facility ID Number: MD4690307844

Based on the inspection conducted on March 30-31, 2011, the following areas of concern were noted:

- The inside machine shop (building 11) has a grit blasting booth connected to a 55 gallon drum of waste outside the building. This waste was stated to be sent out as hazardous waste. This area would be considered a SAA, but the drum did not say hazardous waste or detail the contents.
- The inside machine shop (building 11) has a paint booth. The waste generated inside the booth gets carried out to a SAA outside the building. The SAA is not

- under control of the operator or at or near the point of generation for the waste stream. The SAA is splattered with old paint residue.
- Waste from the paint booth, that was stated to be carried out to the SAA on a daily basis was still sitting in the paint booth from the prior days work.
- At the main paint shop (building 32 and 90), there is a SAA for multiple paint booths outside the building. The waste generated from the paint booths is carried outside to the SAA. The SAA is messy with lots of paint splatter.
- There were 3-55 gallon hazardous waste drums located next to the SAA at the main paint shop. The Facility stated this is a staging area for the other SAA's before being sent over to the less than 90 storage (building 151). There were no start accumulation dates on these drums.
- In the engine repair and maintenance (building 5) shop, the Facility had a 30 gallon hazardous waste slop drum in their SAA that was stated to be full and ready to move. There was no start accumulation date on the drum. The Facility later put a start accumulation date on the drum during the inspection.
- A trailer located next to the engine repair and maintenance shop (building 5) is a trailer, which houses two grit blasting machines. The wastes from these sand blasting machines are stored as hazardous waste based on analysis. Each of the machines has a grit blasting waste collection point, called a filter plate. These filter plates are located outside the trailer. The Facility opens the filter plates and collects the fine grit blast waste. This waste is carried back into the trailer and put into a hazardous waste SAA. Located on the blacktop below the filter plates are piles of fine grit blasting waste. The blacktop slopes towards the water (Arundel Cove). In a rain event the waste could run into the Cove.
- There is a fine layer of the grit blasting waste that covers the entire inside of the trailer. This is the same hazardous waste that is being collected in the 55 gallon hazardous SAA.
- The Facility is using a vacuum to clean up in the trailer, and when the vacuum is full it is being dumped into the SAA. The Vacuum could possibly be another SAA in the trailer.
- In the electronic shop (building 40A) there was a SAA with a 55 gallon hazardous waste drum of aerosol cans. The drum was about ½ full and there were no hazardous waste labels or markings denoting the contents of the drum.
- Also in the electronic shop there was a drum that said hazardous waste oily rags. The drum was almost full. The Facility stated this is non hazardous.
- Near the paint shop in the electronics shop, there was a container of thinner, which had a funnel and appeared to be used to collect waste. There were no hazardous waste labels or markings denoting the contents.
- At the ship lift area the Facility had a SAA with a 55 gallon hazardous waste drum. There was a funnel on the drum, but the funnel was just sitting on top the open bung of the drum. The drum was not closed.
- At the Oakridge dry dock area, the Facility has a SAA with a 55 gallon hazardous waste drum, which collected hazardous waste from pier 1, pier 2, and Oakridge area. The drum did not have a hazardous waste label or markings denoting the contents of the drum. There was no start accumulation date on the drum. The drum was collecting waste from multiple areas and processes. The Facility was

- treating this area as an SAA and not a less than 90 day area. No weekly inspections were being conducted for this drum.
- Outside the rigging shop there were multiple clear bags that said lead. These
 bags of lead were considered waste from cutting and pressing operations of lead
 ballasts. The bags were stated to be hazardous waste per the Facility. There were
 no other markings on the clear bags.
- In the pipe shop (building 8) the Facility had a SAA with a 55 gallon for hazardous waste aerosol cans. There was no hazardous waste label or markings to denote the contents of the drum. Along with the aerosol cans being generated in building 8, building 8A, which is separated from building 8 by a door, brings over their waste aerosol cans and puts them into the SAA in building 8. The hazardous waste aerosol cans generated in building 8A are not under control or near the point of generation for the waste stream.
- The contractor KIRA has a bulb crusher in their building. The drum attached to the crusher machine has a label of universal waste. The filter media, once no longer viable is put into the drum with the crushed bulbs.
- In the less than 90 day storage (building 151) there was a 1 gallon container of finisher with no hazardous waste label and start accumulation date. There was a warning on the finisher label that stated the product was flammable.
- The pallets of paint related material and batteries had a single label for each pallets and not on each container.
- The Facility was storing lead acid batteries outside of building 66. None of the batteries stored in this area had a waste label and start accumulation date.
- The Facility did not have the name of the employee conducting the inspection for the weeks of 3/21/2011, 4/30/2010, 4/8/2010, 4/1/2010, 3/25/2010, 3/18/2010, 3/11/2010.

RESOURCE CONSERVATION RECOVERY ACT SUBTITLE-C INSPECTION

U.S. Coast Guard 2401 Hawkins Point Rd. Baltimore, MD 21226

RCRA Number: MD4690307844

Inspection Date: March 30-31, 2011

EPA Inspector:

Justin Young

Physical Scientist/Inspector – OECEJ

410-305-3029

MDE Representative:

Baruch Onyekwelu

Hazardous waste inspector

410-537-3400

Facility Representatives:

John Moore

Environmental Protection Specialist

410-636-3775

Robert DeMarco

Environmental Protection Specialist

410-636-7070

Christina Wisniewski

Environmental Protection Specialist

410-636-7026

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Background

The inspection of U.S Coast Guard Yard (the Facility) was conducted by the Office of Enforcement, Compliance and Environmental Justice (OECEJ) Region III, on March 30-31, 2011. EPA inspector, Justin Young presented his credentials to the Facility as an authorized representative of the Agency, and then Mr. Young briefly explained the scope and time frame of the inspection to Facility personnel. Prior to the inspection, Mr. Young contacted the Maryland Department of the Environment. Mr. Baruch Onyekwelu (MDE) was present for the first day of the inspection. Based on information provided by the EPA regional office, the Facility is a large quantity generator of hazardous waste. Mr. Young informed the Facility that he was Confidential Business Information (CBI) cleared. At any point in the inspection, the Facility needed to notify the inspectors if the information was considered CBI.

The first portion of the inspection began with the Facility representatives explaining the processes conducted at the Facility. The EPA inspector was accompanied on a physical tour of the Facility by Mr. Robert DeMarco and Ms. Christina Wisniewski. The Facility has been at the current location since 1899. The Facility encompasses approximately 120 acres. The Facility employees a total of 1500 people. 1300 of the 1500 employees work in the industrial portion of the Facility. The industrial portion of the Facility runs in 2 shifts from about 5am to 11pm. Attachment #1 shows a basic layout of the Facility.

<u>Process Description</u>

The Facility conducts shipbuilding and repairs on Coast Guard Vessels. The Facility also houses operations that support the mission of the Coast Guard and their shipbuilding and repairs. The shipbuilding and repairs of Coast Guard vessels include engine maintenance, painting, and repairing ship electronics. The Facility is host command to 12 units (ANT Baltimore, Sector Baltimore, Station Curtis Bay, Legacy Sustainment Support Unit, Asset Project Office, Human Resource Center, ESD Baltimore, HSWL, Engineering Logistics, Surface Logistics, Electronics Lab, and MSU Baltimore). The Coast Guard yard also housed two permanent cutters, the USCGC James Rankin and the USCGC Sledge.

Permit Status

The Facility notified as a Large Quantity Generator (LQG) of hazardous waste, thus subject to the less than 90 day generator standards. The facility is not permitted to treat, store or dispose of hazardous waste.

Hazardous Waste and Universal Waste Generation

Hazardous Waste Generation

- <u>Paint waste</u> The Facility generates hazardous waste from the painting operations conducted throughout the Facility. The waste is handled at satellite accumulation area (SAA) prior to being transported to the less than 90 day storage area.
- Blasting grit Waste The facility generates hazardous waste through their multiple grit blasting machines. The Facility stores this waste in SAA's before being transported to their less than 90 day storage area.

Universal Waste Generation

- <u>Used Lamps</u> The facility generates used fluorescent light tubes on site. The lamps are managed by a government contractor KIRA.
- <u>Used Batteries</u> The facility generates used lead acid batteries on site. These batteries were being stored outside near building 66.

Inspection Observations

The inspection statements were based on information provided by Mr. Robert DeMarco and Ms. Christina Wisniewski, along with site specific employees.

Inside Machine Shop (Building 11)

The main activity within this building is the maintenance and repair of vessel engines. The shop foreman for the building is Mr. Bob Byrd. The shop houses a 55 gallon hazardous waste SAA (See Photo #1). This SAA accumulates waste aerosol cans that are used throughout the shop. The drum is located next to the stock maintenance room. The drum was labeled with the words hazardous waste aerosol and had a closed lid. The EPA inspector viewed inside the drum, which was 2/3 full. Also located in this building is blasting booth (See Photo #2) and paint booth. The EPA inspector spoke with painter Mr. Mike Anderson. The blasting booth has a vented air system, which collects the fine blasting grit and deposits it into a 55 gallon drum located outside of the building. In conversations with the Facility, this waste stream is considered to be hazardous based on analysis. At the time of the inspection this collection drum did not have any hazardous waste label or contents (See Photo #3). The Facility was not treating this drum as a SAA for hazardous waste. Within the paint booth, there were multiple containers of liquid and semi-liquid contents (See Photo #4). Mr. Anderson stated this was waste that at the end of the day be carried outside to a hazardous waste SAA slop drum. The Facility has a SAA for slop waste from painting operations in the paint booth. This SAA is located outside of the building in a PIG containment unit (See Photo #5). The EPA inspector asked when the waste in the paint booth was generated and Mr. Anderson stated the waste was from the prior days activities and had been sitting in the paint booth overnight. There were no hazardous waste labels or contents marked on the containers in the paint booth. The SAA for the slop paint was closed with a label. The inspector tapped on the drum, which indicated it was ½ full. There was paint splattered all over the containment and the drum at the time of the inspection.

Paint Shop (Building 32 & 90)

This area of the Facility housed the majority of the painting operations. The EPA inspector met with the general foreman for painting, Mr. Leon Wilson. The majority of the painting being done was on buoys, and miscellaneous prefabrication parts for the vessels (See Photo #6). Once the painting operations were finished, left over slop and thinner was brought out to a SAA for hazardous waste paint slop. This SAA is located outside of building 32. This SAA accumulates hazardous waste from painting operations inside of building 32 and building 90. The SAA housed a 55 gallon drum inside of a PIG containment unit (See Photo #7). The drum was closed and labeled. There was paint splattered all over the drum and containment unit. Located right next to the SAA for building 32, were 3 other hazardous waste drums of paint slop (See Photo #8 & #9). The EPA inspector asked the Facility where these drums originated. The Facility stated the area beside the SAA for building 32 is considered a staging area, where hazardous waste paint slop drums from other SAA's located at the Facility are stored prior to being sent to the less than 90 storage area. At the time of the inspection the 3 drums of hazardous waste paint slop had labels and were closed, but none of them had start accumulation dates.

Engine Building (Building 5)

The main activity within this building is engine maintenance and repair. The EPA inspector met with shop planner, Mr. Gary Ludwig. The Facility has an SAA located next to a paint booth. Within the SAA is a 20 gallon drum of waste aerosol cans and a 30 gallon drum of waste paint slop (See Photo #10). The aerosol cans are collected from throughout the building and the waste paint slop is from painting operations in the paint booth. This building also has 5 part cleaning washers that were stated to be handled by Safety Kleen Inc. The Facility has a 5,000 gallon caustic cleaning tank that is used to clean engines. Once the caustic solution is no longer viable, the Facility stated the waste is sent out as hazardous waste. The Facility uses a third party contractor (Clean Venture) to come and clean the tank. Located in a trailer next to building 5 are two grit blasting machines. This area is used by the employees in building 5 to clean and blast miscellaneous engine parts. According to Mr. Ludwig, there are two filter plates that catch the waste blasting grit/powder. These units are connected to the outside of the trailer. The filter plates are emptied by employees 2 times a month, into a pale and brought back into the trailer, where the waste grit/powder is stored in a black 55 gallon hazardous waste drum. This area is designated as a SAA (See Photo #11). The EPA inspector observed what appeared to be waste grit/powder piled up on the blacktop below the filter plate (See Photo #12). This blacktop slopes towards the water (Arundel Cove). The EPA inspector also observed what appeared to be a fine grit/powder layer covering the cabinets, machines, and furniture inside the trailer near the 55 gallon SAA drum (See **Photo #13 & #14).** The Facility also stated they use a vacuum to clean up the trailer (See **Photo #15**). Once the vacuum is full, it is emptied into the 55 gallon SAA.

Electronic Shop (Building 40A)

The main activity associated with this building is the rebuilding and installation of electronic systems on the vessels. EPA inspector met with electronic shop foreman Mr. Brian Ames. Within the front of the electronic shop the Facility has a small paint booth. Mr. Ames stated they only use paint cans to spray paint. The Facility had a black 55 gallon drum they were using to collect the waste aerosol paint cans. The cans were stated to be treated as hazardous waste but the drum did not have any type of markings denoting hazardous waste or the contents of the drum (See Photo #16). The EPA inspector observed the drum was ½ full. Once the Mr. Young relayed his concerns, the Facility labeled the drum detailing the contents as hazardous waste aerosol cans (See Photo #17). There was a black 55 gallon drum that stated hazardous waste oily rags (See Photo #18). Ms. Wisniewski stated this was an incorrect designation of the drum. The drum was not hazardous waste. The oily rags throughout the rest of the Facility were being treated as non hazardous waste. Located near a large main paint booth in the electronic shop was a grit blasting machine (Snap-On) (See Photo #19). The blasting grit is vacuumed up and put into a 55 gallon drum. The EPA inspector asked if the Facility had made a determination on the waste. The Facility stated they have analysis for the waste. The Facility then stated this machine has only been in use for a few months and they have not shipped out waste from this unit. Located outside of the paint booth was a container of thinner that had a funnel and appeared to be waste-like (See Photo #20). The EPA inspector asked who was in charge of the area and the Facility stated the painter Mike Rockocy. Mr. Rockocy was not present during the inspection. Outside of the building was a SAA for the paint slop from the paint booth. The drum was in a PIG containment unit, along with another drum that was labeled used oil (See Photo #21). The paint slop drum was empty at the time of the inspection.

Shiplift

The main activity is the dry docking of Coast Guard vessels for repair and maintenance. The EPA inspector met with paint supervisor Mr. Larry Phinney. There is a SAA in a PIG containment unit. The SAA houses a tan 55 gallon hazardous waste drum (See Photo #22). There is a funnel on top the drum sitting in an open bung.

Oakridge Dry Dock SAA

The main activity is this area is the maintenance and repair being conducted on the vessels from pier 1, 2 and Oakridge dry-docks. The SAA has a 55 gallon dry located is a PIG containment unit (See Photo #23). The drum was closed but there were no labels denoting hazardous waste or the contents of the drum. The Facility stated this drum is being treated as a hazardous waste drum. Waste being collected in this drum is from multiple generation points from pier 1, 2, and Oakridge dry-docks. There is no start accumulation date on the drum.

Rigging Shop

Located outside the rigging shop are clear plastic bags with the words lead on each container. The EPA inspector asked if this material is waste and the Facility stated yes these bags are lead waste that were generated from the cutting and pressing of lead ballasts (See Photo #24). The waste was stated by Ms. Wisniewski as going to be sent out as hazardous waste. There were no other markings on the bags. No hazardous waste labels or start accumulation dates. This area was not a designated SAA by the Facility.

Inside Machine Shop (Building 8A)

The main activity within this building is machine work on vessel components. The EPA inspector met with machine shop supervisor Mr. Dave Sackalosky. There is a bead blasting machine in the shop. The waste is considered non hazardous based on analysis. At the time of the inspection the Facility was unable to produce analytical results for the waste stream.

Pipe Shop (Building 8)

This building conducts maintenance work in support of the Coast Guard vessels. Within the building the Facility has a 55 gallon hazardous waste aerosol drum (See Photo #25). The EPA inspector asked where the aerosol cans were being generated. The Facility stated they generate the aerosol cans in building 8A and bring the waste cans through a doorway and into building 8. The 55 gallon drum did not say hazardous waste or have any labels denoting the contents. There was a label on the wall that stated aerosol can drum. Once the EPA inspector conveyed this concern, the Facility put a label on the drum.

Outside Machine Shop (Building 58)

The activity within this building includes maintenance machine work. There is a 55 gallon hazardous waste drum for waste aerosol cans (See Photo #26). The drum was labeled and closed. The drum was observed to be ½ full.

KIRA Building

This building is run by an onsite third party contractor (KIRA). According to the Facility the contractor just recently started on March 16, 2011. The EPA inspector met with project manager, Mr. Buck Buchanan. KIRA does some basic maintenance work at the Facility, including the service and repair associated with the lighting. Within the building there is a lamp/bulb crusher (See Photo #27). The process for disposing of lamps was a contact for each building would call KIRA and they would come replace the lights. The lamp crusher sits atop a 55 gallon drum. The drum has a universal waste

label with a start accumulation date of 3/29/2011. The EPA inspector asked what is done with the HEPA filter once it is changed out. KIRA stated they put the filter inside the drum and send everything out as universal waste.

Less than 90 Day Storage Area (Building 151)

This building is the main accumulation area (MAA) for the Facility's hazardous waste before disposal. There were 17 drums of waste, 2 cardboard boxes of used mercury lamps, 1 red plastic container of hazardous waste gas, 1 can of finisher, 3 pallets of batteries, and 2 pallets of waste paint related material (See Photos #28 - #33). At the time of the inspection the oldest start accumulation date on the containers was 1/5/2011 (See Photo #34). The waste batteries and paint related material had a single hazardous and or universal waste label for each pallet. The finisher did not have any type of hazardous waste label or associated start accumulation date. The original label warned the material is flammable (See Photo #35).

Lead Acid battery Storage (Outside Building 66)

The Facility was storing there waste lead acid batteries outside next to building 66. The Facility employees either bring the batteries over directly or contact Ms. Wisniewski to come and pick up the batteries. At the time of the inspection there were two full pallets of lead acid batteries. The Facility stated they have an agreement with an outside company to pick up the batteries for recycling. The garage supervisor, Mr. Bob Kline is in charge of calling for a battery pickup. There were no start accumulation dates or universal waste labels on any of the batteries (See Photos #36 - #38).

Records Review

Manifests and LDR

During the inspection, the EPA inspector reviewed the manifests and LDR's for the Facility. The Facility had records of the manifests and LDR's for the past three (3) years and appeared to be in good order. The EPA inspector obtained a copy as an example (See attachment #2).

Biennial Report

The Facility had their latest biennial report on file for reporting year 2009.

Weekly Inspections

The Facility was conducting weekly inspections at their less than 90 day hazardous waste storage area. During the review of the weekly inspections, the EPA inspector observed deficiencies for the weeks of 4/30/2011, 4/8/2010, 4/1/2010,

3/11/2010, 3/18/2010, 3/25/2010. The name of the employee inspecting the MAA was not listed on the weekly inspection report (See attachment #3).

Contingency Plan

The EPA inspector reviewed the Facility's contingency plan. The plan was last updated in April 2010. The emergency contact information was up to date and the Facility has notified local authorities. The plan appeared to have all the required elements.

Training

The EPA inspector reviewed the Facility's training documents. According to the Facility each employee goes through an EMS training once a year. The EPA inspector obtained job description and duties for Mr. Robert Demarco, Mr. John Moore, and Ms. Christina Wisniewski along with hazardous materials training certificates for Mr. John Moore, and Ms. Christina Wisniewski (See attachment #4).

Analytical

The Facility used a combination of generator knowledge and analytical testing to determine their waste streams. The EPA inspector obtained a copy of analytical test result for their grit blasting waste stream from building 5. The analysis for the hazardous waste stream can be seen as **Attachment #5**. At the time of the inspection, the Facility was unable to provide any other analytical results on their other waste streams.

Information Letter

Subsequent to the inspection, Mr. Robert DeMarco sent a package of information to the EPA inspector addressing inspection closeout concerns. The package of information was received by the inspector on April 20, 2011. Attachment #6 shows a letter detailing the Facility's implementations along with a DVD of attachments and photographs.

List of Photos

Photo No.	Photo Description
1	Building 11 aerosol SAA
2	Building 11 blasting booth
3	Building 11 grit blasting drum
4	Building 11 paint booth
5	Building 11 paint slop SAA
6	Building 32/90
7	Building 32/90 SAA
8	Building 32/90 drum staging area
9	Building 32/90 drum staging area
10	Building 5 SAA
11	Building 5 trailer SAA
12	Building 5 trailer filter plate grit build up on blacktop
13	Building 5 trailer grit covering cabinet
14	Building 5 trailer grit on wooden palette
15	Building 5 trailer vacuum
16	Building 40A small paint shop SAA no label
17	Building 40A small paint shop SAA with label
18	Building 40A incorrect hazardous waste designation
19	Building 40A grit blasting machine
20	Building 40A waste-like thinner containers outside main electronic paint shop
21	Building 40A paint slop SAA
22	Shiplift SAA
23	Oakridge Dry Dock SAA
24	Outside of rigging shop waste lead bags
25	Building 8 aerosol SAA
26	Building 58 aerosol SAA
27	KIRA bulb/lamp crusher
28	MAA overviews
29	MAA overviews
30	MAA overviews
31	MAA overviews
32	MAA overviews
33	MAA overviews
34	Oldest start accumulation date in MAA
35	Flammable finisher can in MAA with no label or date
36	Lead/acid battery storage area
37	Lead/acid battery storage area
38	Lead/acid battery storage area

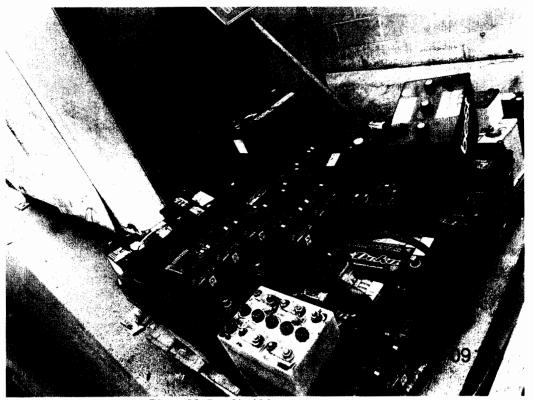


Photo 38: Lead/acid battery storage area



Photo 36: Lead/acid battery storage area

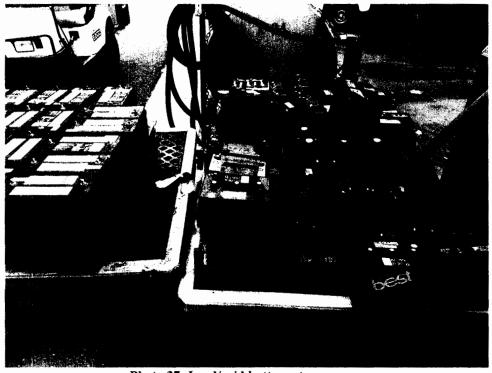


Photo 37: Lead/acid battery storage area

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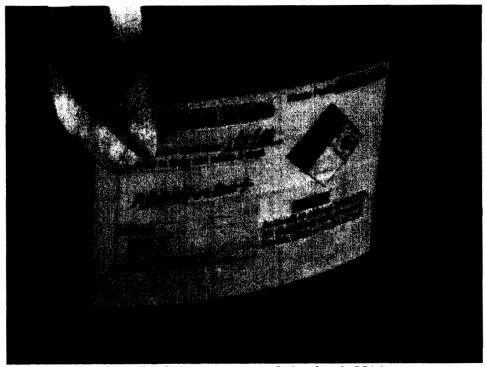


Photo 34: Oldest start accumulation date in MAA



Photo 35: Flammable finisher can in MAA with no label or date

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Photo 32: MAA overviews

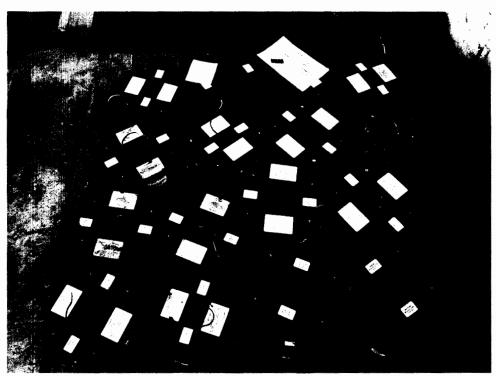


Photo 33: MAA overviews

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Photo 30: MAA overviews



Photo 31: MAA overviews

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Photo 28: MAA overviews



Photo 29: MAA overviews



Photo 26: Building 58 aerosol SAA

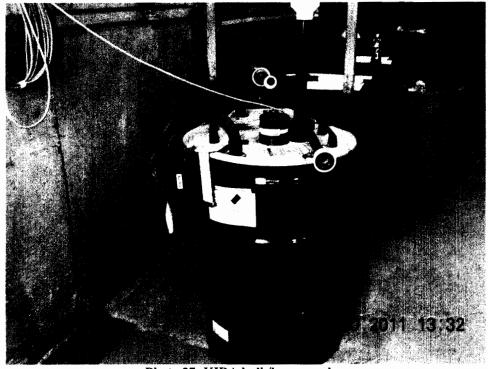


Photo 27: KIRA bulb/lamp crusher

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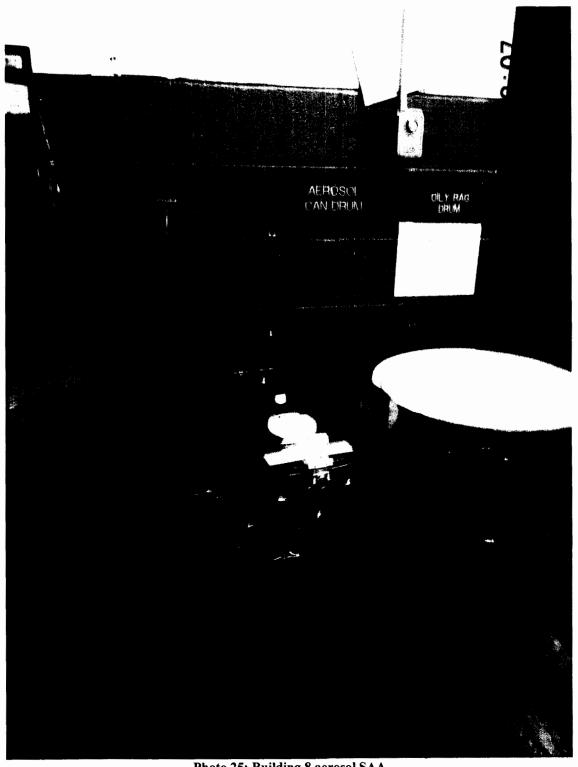


Photo 25: Building 8 aerosol SAA



Photo 23: Oakridge Dry Dock SAA

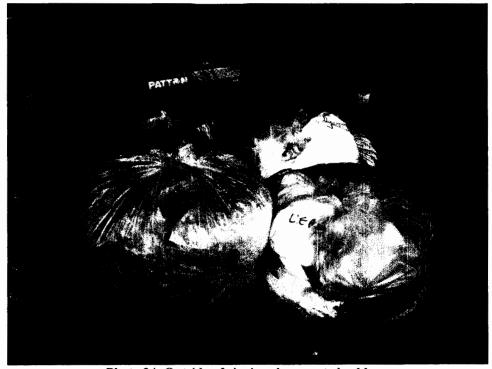
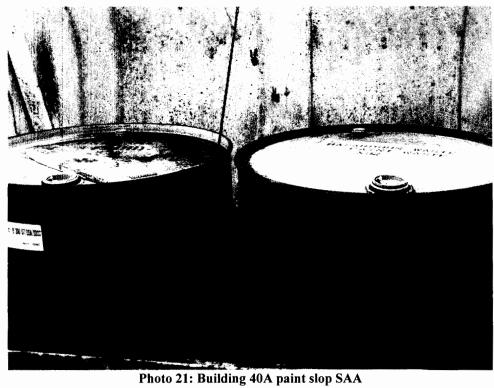
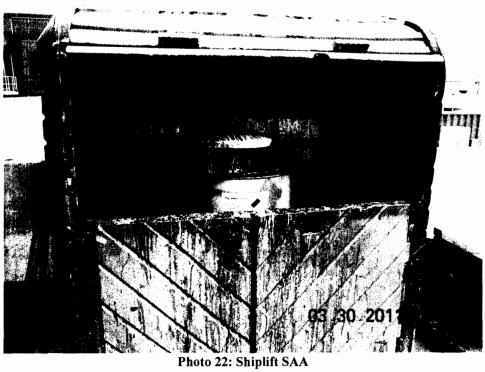


Photo 24: Outside of rigging shop waste lead bags

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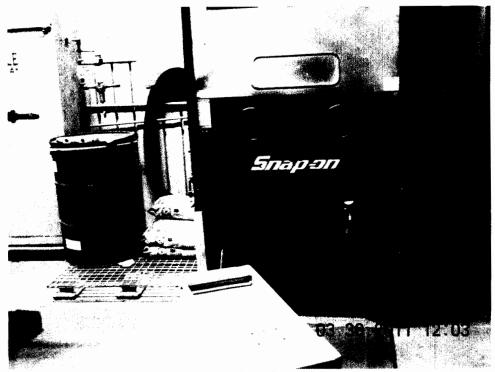


Photo 19: Building 40A grit blasting machine



Photo 20: Building 40A waste-like thinner containers outside main electronic paint shop

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Photo 17: Building 40A small paint shop SAA with label

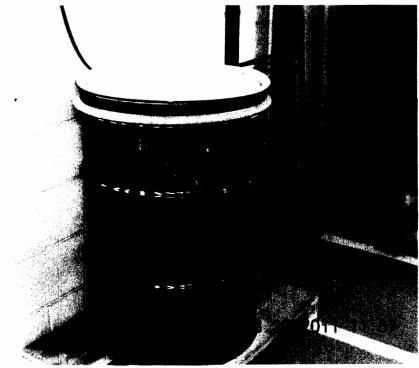


Photo 18: Building 40A incorrect hazardous waste designation

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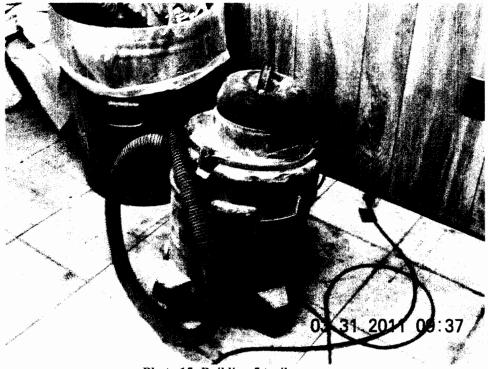


Photo 15: Building 5 trailer vacuum



Photo 16: Building 40A small paint shop SAA no label

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Photo 13: Building 5 trailer grit covering cabinet

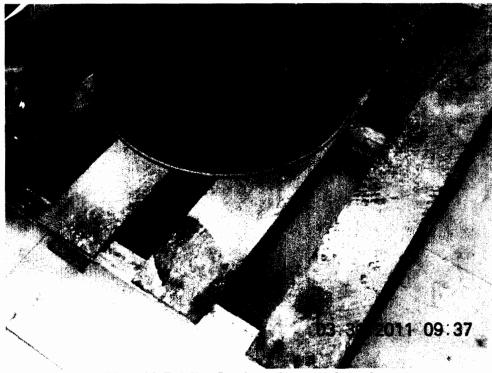


Photo 14: Building 5 trailer grit on wooden palette

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Photo 11: Building 5 trailer SAA

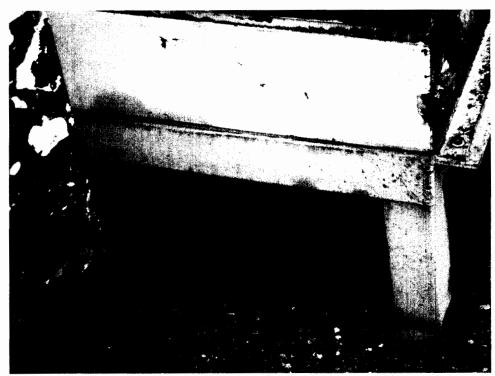


Photo 12: Building 5 trailer filter plate grit build up on blacktop

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Photo 9: Building 32/90 drum staging area



Photo 10: Building 5 SAA

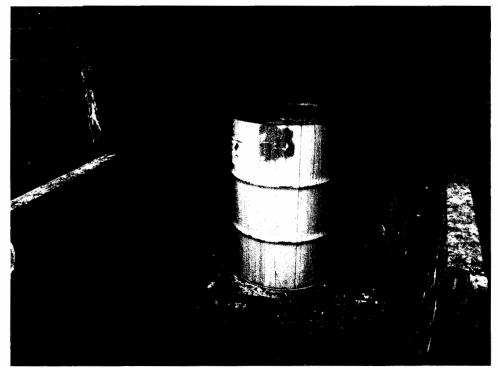


Photo 7: Building 32/90 SAA

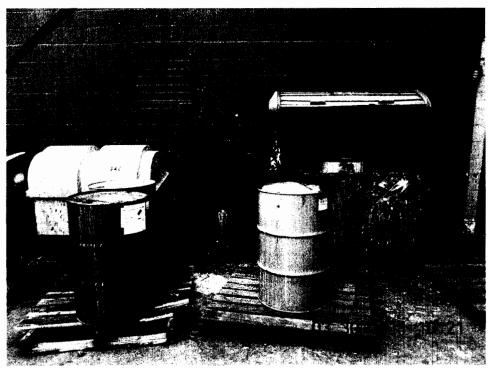


Photo 8: Building 32/90 drum staging area

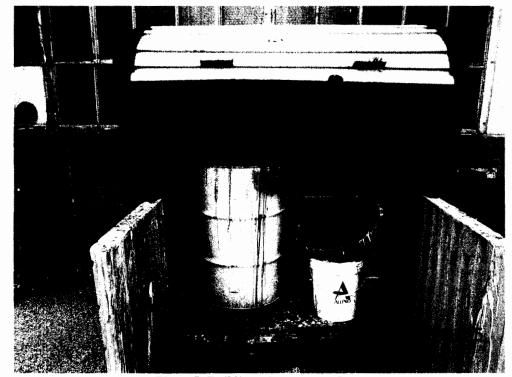


Photo 5: Building 11 paint slop SAA



Photo 6: Building 32/90

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Photo 4: Building 11 paint booth

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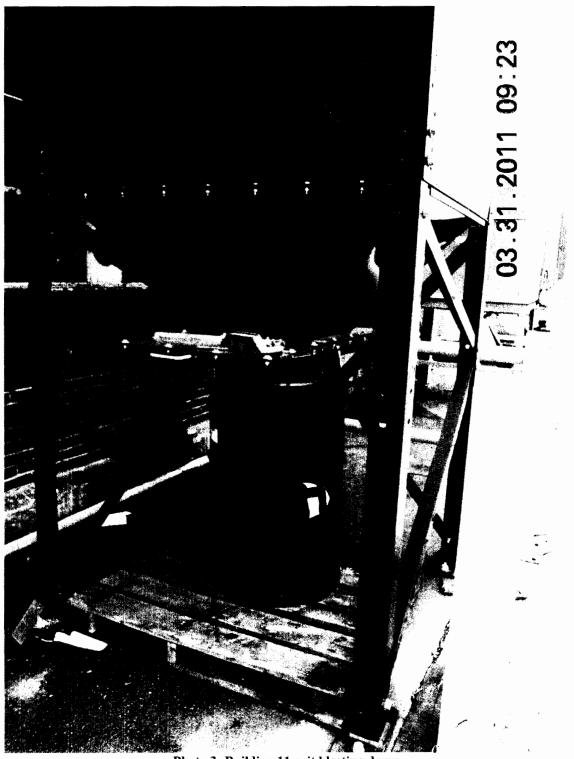


Photo 3: Building 11 grit blasting drum



Photo 2: Building 11 blasting booth

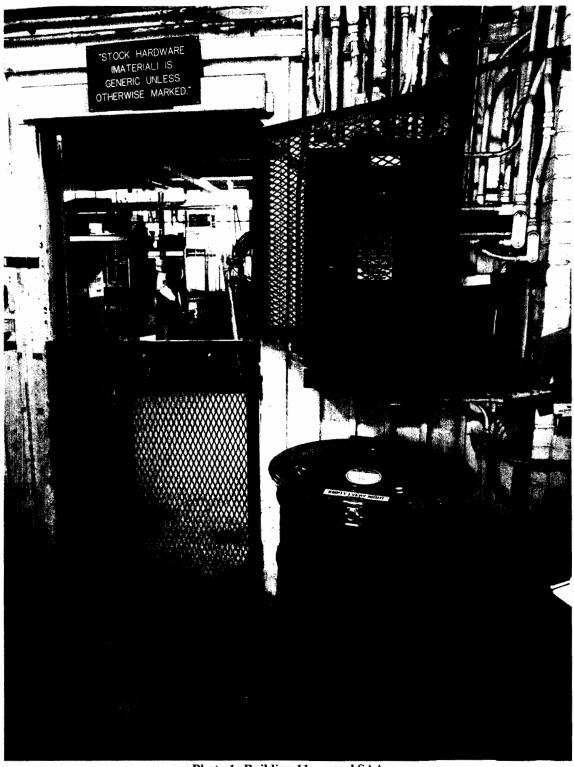


Photo 1: Building 11 aerosol SAA

List of Attachments

Attachment No.	Attachment Description
1	Facility map
2	Examples of Manifest's and LDR's
3	MAA weekly inspections
4	Training information and certifications
5	Analytical results
6	Information letter

